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17 PRO TRUCKING, INC. d/b/a PRO ADVANTAGE  
18 & GEOFFREY LUNNING

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

14 LYN L. STAMLER,

15 Plaintiff,

16 vs.

17 PRO TRUCKING, INC., a Minnesota  
18 Domestic Corporation d/b/a PRO  
19 ADVANTAGE; GEOFFREY  
20 LUNNING; DOES 1 through 20,  
inclusive; and ROE BUSINESS  
ENTITIES 1 through 20, inclusive,

21 Defendants.

Case No. 2:22-cv-02023-JAD-NJK

**STIPULATION AND ORDER TO  
DISMISS WITH PREJUDICE**

[ECF No. 47]

22 PRO TRUCKING, INC., a Minnesota  
23 Domestic Corporation; GEOFFREY  
24 LUNNING,

25 Third-Party Plaintiffs,

26 vs.

27 ADVENTURE PILOTING, a Utah  
Company, JAMIE LYNNE  
28 HOLDAWAY; DOES 1 through 20.

1 inclusive; and ROE BUSINESS  
 2 ENTITIES 1 through 20, inclusive.,  
 3  
 Third-Party Defendants.

#### 4 STIPULATION AND ORDER TO DISMISS WITH PREJUDICE

5 Plaintiff LYN L. STAMLER (“Plaintiff”), by and through her attorneys of  
 6 record, Joshua L. Benson, Esq. of Benson Allred Injury Law, Defendants,  
 7 GEOFFREY LUNNING and PRO TRUCKING INC. (“Defendants”), by and through  
 8 their attorneys of record, Scott W. Ulm, Esq., Melissa Ingleby, Esq., and Ashley L.  
 9 Zurkan, Esq. of Bremer, Whyte, Brown & O’Meara, LLP, (collectively, the “Parties”),  
 10 and Third-Party Defendants ADVENTURE PILOTING and JAMIE LYNNE  
 11 HOLDAWAY, by and through their attorneys of record, Ryan L. Dennett, Esq. of  
 12 Dennett Winspear, and **hereby stipulate and agree to the DISMISSAL WITH**  
 13 **PREJUDICE** of all claims for relief asserted in the Complaint in Case No. 2:22-cv-  
 14 02023.

15 Each party further agrees to bear its own fees and costs.

16 **IT IS SO STIPULATED.**

17 DATED this 23<sup>rd</sup> day of September  
 18 2024

19 **BENSON ALLRED INJURY LAW**

21 /s/ Joshua Benson

22 **JOSHUA L. BENSON, ESQ.**  
 23 Nevada Bar No. 10514  
 24 333 N. Rancho Drive, Suite 420  
 Las Vegas, Nevada 89106  
*Attorney for Plaintiff*

20  
 21 DATED this 23<sup>rd</sup> day of September  
 22 2024

23 **BREMER WHYTE BROWN &**  
**O’MEARA, LLP**

24 /s/ Melissa Ingleby

25 **SCOTT W. ULM., ESQ.**  
 26 Nevada State Bar No. 12652  
**MELISSA INGLEBY, ESQ.**  
 27 Nevada Bar No. 12935  
**ASHLEY L. ZURKAN ESQ.**  
 28 Nevada Bar No. 16473  
*Attorneys for Defendants Lunning and*  
*Pro Trucking*

*Stamler v Pro Trucking*  
Case No. 2:22-cv-02023  
*Stipulation and Order to Dismiss*  
*with Prejudice*

DATED this 23<sup>rd</sup> day of September  
2024

# DENNET WINSPEAR, LLP

By: /s/ Ryan Dennett

**RYAN L. DENNETT., ESQ.**

Nevada State Bar No. 5617  
3301 N. Buffalo Drive, Suite 195  
Las Vegas, Nevada 89129  
*Attorneys for Defendants*  
*Adventure Piloting and Jamie*  
*Holdaway*

## ORDER

Based upon the stipulation of the parties and with good cause appearing, IT IS HEREBY ORDERED that this case is dismissed with prejudice, with each party to bear its own costs and fees. The Clerk of Court is directed to CLOSE THIS CASE.

United States District Judge  
Dated: September 24, 2024

Respectfully submitted,

# BREMER WHYTE BROWN & O'MEARA LLP

By: /s/ *Melissa Ingleby*

SCOTT W. ULM, ESO.

Nevada State Bar No. 12652

MELISSA INGLEBY, ESO

Nevada State Bar No. 12935

ASHLEY L. ZURKAN, ESQ.

Nevada State Bar No. 16

## *Attorneys for Defendants*

**PRO TRUCKING, INC. d/b/a**